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September 16, 2021

Honorable Denise L. Cote, USDJ  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007

Re: *U.S. v. Brandon Bell*  
20 Cr. 602 (DLC)

Dear Judge Cote:

Brandon Bell is scheduled to be sentenced on October 6, 2021 and his sentencing submission is due on September 24, 2021. With no objection from the government, I am requesting that sentencing be adjourned for four weeks.

On June 22, 2021, the Department of Justice filed a statement in support of the Equal Act that would eliminate the disparity between cocaine and crack. In August 2021, the Department of Justice provided some guidance to the various United States Attorneys' offices relating to active cases involving crack. As a result, I will be meeting with prosecutors and supervisors about how the new guidance impacts on Mr. Bell's plea and sentence. I hope to do this in the next few weeks.

I would prefer to file my sentencing submission after meeting with the government and resolving any issues relating to the new guidance for crack cases. Mr. Bell remains compliant with home confinement restriction.

Thank you for your Honor's consideration.

*Sam A. Schmidt*  
*Denise Cote*  
*9/16/21*

Respectfully submitted,

/s/  
Sam A. Schmidt, Esq.  
Attorney for Brandon Bell